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December 30, 2004

**VIA OVERNIGHT DELIVERY**

Ms. Mary Cottrell, Secretary  
Massachusetts Department of Telecommunications and Energy  
One South Station  
Boston, Massachusetts 02110

Re: D.T.E. 04-33: Petition of Verizon New England Inc. for Arbitration of an Amendment to Interconnection Agreements with Competitive Local Exchange Carriers and Commercial Mobile Radio Service Providers in Massachusetts Pursuant to Section 252 of the Communications Act of 1934, as Amended, and the *Triennial Review Order*

Dear Ms. Cottrell:

A.R.C. Networks Inc. d/b/a InfoHighway Communications Corporation, Broadview Networks Inc. and Broadview NP Acquisition Corp., Bullseye Telecom Inc., Cleartel Telecommunications, Inc. f/k/a Essex Acquisition Corp., Comcast Phone of Massachusetts, Inc., DIECA Communications Inc. d/b/a Covad Communications Company, DSCI Corp., IDT America Corp., KMC Telecom V Inc., Metropolitan Telecommunications of Massachusetts, Inc. d/b/a MetTel, Spectrotel Inc., Talk America Inc., XO Communications, Inc. and XO Massachusetts, Inc. (the "Competitive Carrier Group") submit these comments in support of the Motion of AT&T Communications of New England, Inc. for Reconsideration of Schedule in December 15, 2004 Department Order (the "AT&T Motion"). Specifically, the Competitive Carrier Group respectfully requests that the Massachusetts Department of Telecommunications and Energy (the "Department") (1) adopt the procedural schedule for the above-referenced proceeding proposed by the AT&T Motion; and (2) delegate to the Hearing Officer in the above-referenced proceeding authority to establish such procedural schedule, subject to change as future events may require.

The procedural schedule proposed by the AT&T Motion would promote the most efficient use of scarce Department and CLEC resources, and at the same time, would ensure arbitration of an amendment to existing interconnection agreements between Verizon and

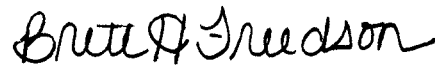
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Massachusetts CLECs, to reflect the permanent unbundling rules to be released by the Federal Communications Commissions ("FCC"), within the time frame contemplated by sections 251 and 252 of the Communications Act of 1934, as amended, 47 U.S.C. § 251, 252. As discussed more fully in the AT&T Motion, the FCC's December 15, 2004 Press Release, announcing the FCC's permanent unbundling rules, is not sufficiently detailed to permit meaningful negotiations between Verizon and Massachusetts CLECs for an amendment to existing interconnection agreements. By contrast, the procedural schedule proposed by the AT&T Motion would provide the parties an opportunity to fully review the FCC's permanent unbundling rules prior to commencing such negotiations, and thereby would reduce the likelihood that the issues presented to the Department for arbitration will be modified at some future time. Accordingly, the Department's grant of the AT&T Motion would benefit the Department and the parties alike.

Please feel free to contact the undersigned counsel at (202) 887-1211 if you have any questions or require further information.

Respectfully submitted,



Brett Heather Freedson

cc: Service List (via email)